

EXHIBIT A

Jason C. Murray (CA Bar No. 169806)
 Robert B. McNary (CA Bar No. 253745)
 CROWELL & MORING LLP
 515 South Flower St., 40th Floor
 Los Angeles, CA 90071
 Telephone: 213-443-5582
 Facsimile: 213-622-2690
 Email: jmmurray@crowell.com
 rmcnary@crowell.com

Jerome A. Murphy (*pro hac vice*)
 Astor H.L. Heaven (*pro hac vice*)
 CROWELL & MORING LLP
 1001 Pennsylvania Avenue, N.W.
 Washington, D.C. 20004
 Telephone: 202-624-2500
 Facsimile: 202-628-5116
 Email: jmurphy@crowell.com
 aheaven@crowell.com

Counsel for Target Corp. and ViewSonic Corporation

[additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

**In re: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION**

Master File No. 07-5944 SC

MDL No. 1917

This Document Relates to:

Siegel v. Hitachi, Ltd., No. 11-cv-05502;

Best Buy Co., Inc., et al. V. Hitachi, Ltd., et al., No. 11-cv-05513;

Target Corp. v. Chunghwa Picture Tubes, Ltd., No. 11-cv-05514;

Sears, Roebuck and Co., & Kmart Corp. v. Chunghwa Picture Tubes, Ltd., et al., No. 11-cv-05514-SC;

Sharp Elecs. Corp. v. Hitachi, Ltd., No. 13-cv-01173;

Sharp Elecs. Corp. v. Koninklijke Philips Elecs. N.V., No. 13-cv-02776

**DIRECT ACTION PLAINTIFFS'
 PROPOSED SPECIAL VERDICT
 FORM**

The Honorable Samuel Conti

Siegel v. Technicolor SA, et al., No. 13-cv-05261;

Sears, Roebuck and Co. and Kmart Corp. v. Technicolor SA, No. 3:13-cv-05262;

Best Buy Co., Inc., et al. v. Technicolor SA, et al., No. 13-cv-05264.

Target Corp. v. Technicolor SA, et al., No. 13-cv-05686;

Viewsonic Corp. v. Chunghwa Picture Tubes, Ltd., No. 14-cv-02510

In response to the Court's Order Requesting Supplemental Materials dated November 3, 2014 [MDL Docket No. 2953], the seven direct action plaintiffs whose cases were filed in the Northern District of California ("DAPs") submit their proposed special verdict form to assist the Court in assessing their proposed trial plan. DAPs reserve the right to amend or otherwise revise this special verdict form as appropriate following the Court's rulings on pending or pretrial motions, a final determination of the trial structure for these cases, or as otherwise may be appropriate.

We, the jury, answer the questions that the court submitted as follows:

QUESTION 1

Did Plaintiffs prove that the following defendants knowingly participated in a conspiracy to fix, raise, maintain or stabilize the prices of cathode ray tubes or allocate customers, territories or product markets for cathode ray tubes?

BMCC YES _____ NO _____

Chunghwa YES _____ NO _____

Hitachi YES _____ NO _____

Irico YES _____ NO _____

LG Electronics YES _____ NO _____

LP Displays YES _____ NO _____

Mitsubishi YES _____ NO _____

MTPD YES _____ NO _____

Orion/Daewoo YES _____ NO _____

1	Panasonic	YES _____	NO _____
2	Philips	YES _____	NO _____
3	Samsung	YES _____	NO _____
4	Samtel	YES _____	NO _____
5	Technologies Displays	YES _____	NO _____
6	Thai CRT	YES _____	NO _____
7	Thomson	YES _____	NO _____
8	Toshiba	YES _____	NO _____
9	Videocon	YES _____	NO _____

10 *If you answered "YES" to at least one Defendant, please answer Question 2. If you answered*
 11 *"NO" to every Defendant, please proceed to Question 5.*

12 **QUESTION 2**

13 Did each Plaintiff prove it was injured as a result of the conspiracy?

14	Best Buy	YES _____	NO _____
15	Circuit City	YES _____	NO _____
16	Kmart	YES _____	NO _____
17	Sears	YES _____	NO _____
18	Sharp	YES _____	NO _____
19	Target	YES _____	NO _____
20	Viewsonic	YES _____	NO _____

21 *If you answered "YES" to any Plaintiff, please answer Question 3 as to each Plaintiff for which*
 22 *your answer was "YES." If you answered "YES" as to Plaintiff Best Buy, please answer both*
 23 *Question 3 and Question 4 as to Best Buy. If you answered "NO" to all Plaintiffs, please*
 24 *proceed to Question 5.*

25 **QUESTION 3**

26 What amount of damages did each Plaintiff prove it sustained as a result of the conspiracy
 27 with respect to its direct purchases of products containing cathode ray tubes?
 28

1	Best Buy	\$ _____
2	Circuit City	\$ _____
3	Kmart	\$ _____
4	Sears	\$ _____
5	Sharp	\$ _____
6	Target	\$ _____
7	Viewsonic	\$ _____

8 *If you answered Question 2 "YES" as to Plaintiff Best Buy, please answer Question 4. If you*
 9 *answered Question 2 "NO" as to Best Buy, please proceed to Question 5.*

10 **QUESTION 4**

11 For Plaintiff Best Buy only, what amount of damages did Best Buy prove it sustained as a
 12 result of the conspiracy with respect to its indirect purchases of products containing cathode ray
 13 tubes?

14 Best Buy \$ _____

15 *Please answer Question 5.*

16 **QUESTION 5**

17 Did Plaintiff Sharp prove that the following Defendants knowingly participated in a
 18 conspiracy to exchange information which resulted in cathode ray tubes being priced higher than
 19 they otherwise would have been?

20	LG Electronics	YES _____	NO _____
21	LP Displays	YES _____	NO _____
22	MTPD	YES _____	NO _____
23	Orion/Daewoo	YES _____	NO _____
24	Panasonic	YES _____	NO _____
25	Philips	YES _____	NO _____
26	Technologies Displays	YES _____	NO _____
27	Thomson	YES _____	NO _____
28			

Toshiba YES _____ NO _____

Videocon YES _____ NO _____

If you answered “YES” as to at least one Defendant in Question 5, please answer Question 6. If you answered “NO” to every Defendant in Question 5, please do not answer any other questions; sign and date this form and notify the Court that you have reached a verdict.

QUESTION 6

Did Plaintiff Sharp prove it was injured as a result of a conspiracy to exchange information which resulted in cathode ray tubes being priced higher than they otherwise would have been?

YES _____ NO _____

If you answered “YES,” please proceed to Question 7. If you answered “NO,” please do not answer any other question; sign and date this form and notify the Court that you have reached a verdict.

QUESTION 7

For Plaintiff Sharp only, what amount of damages did Sharp prove it sustained as a result of the conspiracy to exchange information which resulted in cathode ray tubes being priced higher than they otherwise would have been?

Sharp \$ _____

Date: _____

FOREPERSON

/s/ Jason C. Murray
 Jason C. Murray (CA Bar No. 169806)
 Robert B. McNary (CA Bar No. 253745)
CROWELL & MORING LLP
 515 South Flower St., 40th Floor
 Los Angeles, CA 90071
 Telephone: 213-443-5582
 Facsimile: 213-622-2690
 Email: jmurray@crowell.com
 rmcnary@crowell.com

Jerome A. Murphy (*pro hac vice*)
Astor H.L. Heaven (*pro hac vice*)
CROWELL & MORING LLP
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Telephone: 202-624-2500
Facsimile: 202-628-5116
Email: jmurphy@crowell.com
ahaven@crowell.com

Counsel for Target Corp. and ViewSonic Corporation

/s/ Kenneth S. Marks

Kenneth S. Marks
Jonathan J. Ross
Johnny W. Carter
David M. Peterson
John P. Lahad
SUSMAN GODFREY L.L.P.
1000 Louisiana Street, Suite 5100
Houston, Texas 77002
Telephone: (713) 651-9366
Facsimile: (713) 654-6666
Email: kmarks@susmangodfrey.com
jross@susmangodfrey.com
jcarter@susmangodfrey.com
dpeterson@susmangodfrey.com
jlahad@susmangodfrey.com

Parker C. Folse III
Rachel S. Black
Jordan Connors
SUSMAN GODFREY L.L.P.
1201 Third Avenue, Suite 3800
Seattle, Washington 98101-3000
Telephone: (206) 516-3880
Facsimile: (206) 516-3883
Email: pfolse@susmangodfrey.com
rblack@susmangodfrey.com
jconnors@susmangodfrey.com

Attorneys for plaintiff Alfred H. Siegel, solely in his capacity as Trustee of the Circuit City Stores, Inc. Liquidating Trust

/s/ William J. Blechman

Richard Alan Arnold
William J. Blechman
Kevin J. Murray
Ryan Zagare
Jalaine Garcia
James Almon
Kenny Hachwalter, P.A.

201 S. Biscayne Blvd., Suite 1100
Miami, FL 33131
Telephone: (305) 373-1000
Facsimile: (305) 372-1861
Email: rarnold@knpa.com
wblechman@knpa.com
kmurray@knpa.com
rzagare@knpa.com
jgarcia@knpa.com
jalmon@knpa.com

Gavin D. Whitis
Pond North, LLP
100 Spear Street, Suite 1200
San Francisco, CA 94105
Telephone: (415) 217-1240
Facsimile: (415) 644-0578
Email: gwhitis@pondnorth.com

*Attorneys for Plaintiffs Sears, Roebuck and Co. and
Kmart Corp.*

/s/ Craig A. Benson

Craig A. Benson
Joseph J. Simons
Kenneth A. Gallo
Paul Weiss LLP
2001 K Street NW
Washington, DC 20006
Telephone: (202) 223-7343
Email: CBenson@paulweiss.com
jsimons@paulweiss.com
kgallo@paulweiss.com

*Attorneys for Plaintiffs Sharp Electronics Corp. and
Sharp Electronics Manufacturing Company of
America, Inc.*

/s/ David Martinez

Roman M. Silberfeld
David Martinez
ROBINS, KAPLAN, MILLER & CIRESI L.L.P
2049 Century Park East, Suite 3400
Los Angeles, CA 90067-3208
Telephone: 310-552-0130
Facsimile: 310-229-5800
Email: RMSilberfeld@rkmc.com
DMartinez@rkmc.com

Eliot S. Kaplan
K. Craig Wildfang (*Pro Hac Vice*)
Laura E. Nelson
ROBINS, KAPLAN, MILLER & CIRESI L.L.P
800 LaSalle Avenue

2800 LaSalle Plaza
Minneapolis, MN 55402
Telephone: 612-349-8500
Facsimile: 612-339-4181
Email: ESKaplan@rkmc.com
KCWildfang@rkmc.com
LENelson@rkmc.com

*Attorneys for Plaintiffs Best Buy Co., Inc.; Best Buy
Purchasing LLC; Best Buy Enterprise Services, Inc.;
Best Buy Stores, L.P.; BestBuy.com, L.L.C.; and
Magnolia Hi-Fi, Inc.*